

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TRACY HARRIS,

Plaintiff,

v.

Case No.

TRANSUNION, LLC,

Defendant.

DEFENDANT TRANS UNION LLC’S NOTICE OF REMOVAL

COMES NOW, Trans Union LLC (“Trans Union”), incorrectly named TransUnion, LLC, by and through its counsel of record, and hereby files this Notice of Removal, pursuant to 28 U.S.C. § 1446(a) and, in support thereof, would respectfully show the Court as follows:

A. PROCEDURAL BACKGROUND

1. On or about December 6, 2024, Plaintiff Tracy Harris (“Plaintiff”) filed his Complaint (“Complaint”) in this action in the Superior Court of Gwinnett County, Georgia, Case No. 24-A-10916-9 (“State Court Action”). In his Complaint, Plaintiff alleges violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681, *et seq.*

2. Trans Union was served with Plaintiff’s Complaint on December 17, 2024. This Notice of Removal is being filed within the 30-day time period required

by 28 U.S.C. § 1446(b).

3. The time period for filing a responsive pleading in the State Court Action has not expired as of the filing of this Notice of Removal. No orders have been entered in the State Court Action as of the filing of this Notice of Removal.

B. GROUND FOR REMOVAL

4. The present suit is an action over which the United States District Court for the Northern District of Georgia, Atlanta Division, has original jurisdiction pursuant to 28 U.S.C. § 1331 as it is a civil action founded on a claim or right arising under the laws of the United States. This civil action may be removed to this Court by Trans Union pursuant to the provisions of 28 U.S.C. § 1446(b). Removal is proper because Plaintiff's claims present a federal question. 28 U.S.C. §§ 1331 and 1441(a). In the Complaint, Plaintiff seeks damages for Trans Union's alleged violations of the FCRA.

C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

5. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in the United States District Court for the Northern District of Georgia, Atlanta Division, because it is in the district and division embracing the place where the State Court Action is pending.

6. Promptly after the filing of this Notice of Removal, Trans Union shall

give written notice of removal to the Plaintiff and will file a copy of this Notice of Removal with the Superior Court of Gwinnett County, Georgia, as required by 28 U.S.C. § 1446(d).

7. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings, and orders served upon Trans Union in the State Court Action are attached hereto as **Exhibit A**.

8. Trial has not commenced in the Superior Court of Gwinnett County, Georgia.

WHEREFORE, Trans Union respectfully prays that this action be removed to this Court and that this Court assume full jurisdiction as if it had been originally filed here.

Respectfully submitted,

/s/ Paul W. Sheldon

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Counsel for Trans Union LLC

LOCAL RULE 5.1 CERTIFICATION

I hereby certify that TRANS UNION LLC'S NOTICE OF REMOVAL has been prepared in Times New Roman 14-point font in accordance with Local Rule 5.1.

/s/ Paul W. Sheldon

PAUL W. SHELDON

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of January 2025, I filed the foregoing with the Clerk of the Court using the Court's E-Filing system. I further certify that I have mailed the above and foregoing document via United States First Class Mail to the following:

Tracy Harris
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Pro Se Plaintiff

/s/ Paul W. Sheldon

PAUL W. SHELDON